

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

WOODBRIIDGE GROUP OF COMPANIES, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 17-12560 (KJC)

(Jointly Administered)

Ref. Docket No. 831

**CERTIFICATION OF COUNSEL REGARDING PROPOSED ORDER
FURTHER EXTENDING THE TIME WITHIN WHICH THE DEBTORS MUST
ASSUME OR REJECT A CERTAIN UNEXPIRED LEASE OF NONRESIDENTIAL
REAL PROPERTY WITH THE LESSOR'S PRIOR WRITTEN CONSENT**

On March 27, 2018, the Court entered an order [Docket No. 831] (the "Order") extending the deadline to assume or reject unexpired leases of nonresidential real property under section 365(d)(4) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code") through and including July 2, 2018 (the "Deadline") for those of the above-captioned debtors and debtors-in-possession (collectively, the "Debtors") that commenced voluntary cases under chapter 11 of the Bankruptcy Code on December 4, 2017, and February 9, 2018.

Since the entry of the Order, the lessor (the "Lessor") for suites 203 and 302 of that certain real property located at 14140 Ventura Boulevard, Sherman Oaks, California 91423 has consented in writing (the "Written Consent")² to a further extension of the Deadline through and including November 30, 2018 (the "Extension").

¹ The last four digits of Woodbridge Group of Companies, LLC's federal tax identification number are 3603. The mailing address for Woodbridge Group of Companies, LLC is 14140 Ventura Blvd #302, Sherman Oaks, California 91423. Due to the large number of debtors in these cases, which are being jointly administered for procedural purposes only, a complete list of the Debtors, the last four digits of their federal tax identification numbers, and their addresses are not provided herein. A complete list of this information may be obtained on the website of the Debtors' noticing and claims agent at www.gardencitygroup.com/cases/WGC, or by contacting the undersigned counsel for the Debtors.

² The Written Consent is attached to the Proposed Order as Exhibit A.

In light of this, the Debtors request that the Court enter the proposed form of order attached hereto as Exhibit 1 (the “Proposed Order”) granting the Extension. The Debtors submit that the Proposed Order is appropriate and consistent with the discussions between the Debtors and the Lessor, and that entry of the Proposed Order is in the best interests of the Debtors, their estates, and their creditors. As set forth in the Written Consent, the Lessor has consented to the Court’s entry of the Proposed Order.

Accordingly, the Debtors respectfully request that the Court enter the Proposed Order at its earliest convenience without further notice or a hearing.

Dated: May 17, 2018
Wilmington, Delaware

/s/ Ian J. Bambrick
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-and-

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Counsel to the Debtors and Debtors in Possession

EXHIBIT 1

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

WOODBRIIDGE GROUP OF COMPANIES, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 17-12560 (KJC)

(Jointly Administered)

Ref. Docket Nos. 831 & ____

**ORDER FURTHER EXTENDING THE TIME WITHIN
WHICH THE DEBTORS MUST ASSUME OR REJECT A CERTAIN
UNEXPIRED LEASE OF NONRESIDENTIAL REAL PROPERTY
WITH THE LESSOR'S PRIOR WRITTEN CONSENT**

Upon the certification of counsel (the "Certification")² of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for the entry of an order further extending the time within which the Debtors, specifically Brynderwen Investments, LLC (the "Lessee"), must assume or reject the lease for suites 203 and 302 of that certain real property located at 14140 Ventura Boulevard, Sherman Oaks, California 91423 (the "Lease") with the consent of the Lessor, which is attached hereto as Exhibit A; and due and proper notice of the Certification and the relief provided for herein having been given; and it appearing that no other or further notice of the Certification and the relief provided for herein is required; and it appearing that this Court has jurisdiction to consider the Certification pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012; and it appearing that this is a

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² All capitalized terms used but otherwise not defined herein shall have the meanings set forth in the Certification.

core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that venue of this proceeding and the Certification is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this Court may enter a final order consistent with Article III of the United States Constitution; and it appearing that the relief requested in the Certification and provided for herein is in the best interest of the Debtors, their estates, and their creditors; and after due deliberation and sufficient cause appearing therefor, **IT IS HEREBY ORDERED THAT:**

1. The Extension is GRANTED to the extent provided for herein and as agreed to by the Landlord pursuant to the Written Consent, which is attached hereto as Exhibit A.

2. The time within which the Lessee must assume or reject the Lease under section 365(d)(4) of the Bankruptcy Code is extended through and including November 30, 2018.

3. This Order is without prejudice to the rights of the Lessee and its estate to request additional extensions of time to assume or reject the Lease consistent with section 365(d)(4)(B)(ii) of the Bankruptcy Code.

4. Nothing in this Order shall be deemed or construed as (a) an assumption or rejection of any agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code or (b) an admission with respect to whether any of the Debtors' agreements, contracts, or leases is an unexpired lease of nonresidential real property within the meaning of section 365(d) of the Bankruptcy Code.

5. The Debtors are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

6. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Rule 6004(h) of the Federal Rules of Bankruptcy Procedure or otherwise.

7. This Court shall retain jurisdiction to hear and to determine all matters arising from or related to implementation of this Order.

Dated: May ____, 2018
Wilmington, Delaware

KEVIN J. CAREY
UNITED STATES BANKRUPTCY JUDGE

Exhibit A

Written Consent

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:
WOODBRIIDGE GROUP OF COMPANIES, LLC, *et al.*,¹
Debtors.

Chapter 11
Case No. 17-12560 (KJC)
(Jointly Administered)

WRITTEN CONSENT OF LANDLORD TO EXTENSION OF
DEADLINE UNDER 11 U.S.C. § 365(d)(4)

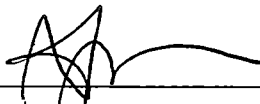
This consent relates to that certain non-residential real property lease, as amended, by and between 14140 Investments, LTD ("Landlord") and Brynderwen Investments, LLC ("Tenant") for suites 203 and 302 of that certain real property located at 14140 Ventura Boulevard, Sherman Oaks, California 91423 (the "Lease").

As you are aware, Tenant filed for protection under title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code") on December 4, 2017. The current deadline for the Tenant to assume or reject the Lease under section 365(d)(4) of the Bankruptcy Code is July 2, 2018 (the "Deadline") pursuant to that certain *Order Extending the Deadline by Which to Assume or Reject Unexpired Leases of Nonresidential Real Property Pursuant to Section 365(d)(4) of the Bankruptcy Code*.

By signing below, the Landlord (i) agrees to an extension of the Deadline through and including November 30, 2018, pursuant to section 365(d)(4)(B)(ii) of the Bankruptcy Code (the "Extension"); (ii) represents that the individual executing this written consent is authorized to consent to the Extension on behalf of the Landlord; and (iii) consents to the entry by the United States Bankruptcy Court for the District of Delaware, under certification of counsel, of an order granting the Extension.

The Landlord's consent to the Extension shall be binding on the Landlord immediately upon execution of this written consent.

Consented and agreed to:
14140 Investments, LTD



By: SCOTT WEISS (print name)

Its: CEO of the General Partner (title)

Dated: 5/15, 2018

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